
Initial Area Designations 2012 Annual PM_{2.5} NAAQS

Air Program Manager Update
February 5, 2014

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Discussion Topics

- 2012 PM_{2.5} NAAQS Implementation Timeline
- Schedule of Major Designation Product Milestones
- Summary of State/Tribal Recommendations
- Key APM Roles in the Designations Process
- Decision Principles
- Process Questions
- Next Steps

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2012 PM_{2.5} NAAQS Implementation Timeline

Milestone	Date
EPA promulgates 2012 PM _{2.5} NAAQS rule	December 14, 2012
Issue Designations Guidance	April 16, 2013
States and tribes submit recommendations for PM _{2.5} designations to the EPA	No later than December 13, 2013
EPA notifies states/tribes re: any intended modifications to their recommendations (120-day letters)	No later than August 14, 2014 (120 days prior to final PM _{2.5} area designations)
EPA publishes public notice of state recs and EPA's intended modifications, if any; EPA initiates 30-day public comment period	No later than August 29, 2014
End of 30-day public comment period	No later than September 29, 2014
States/tribes submit additional information to respond to EPA's modification of a recommended designation	No later than October 29, 2014
EPA promulgates final PM _{2.5} area designations	December 2014 (effective early 2015)
Moderate area SIPs due (18 months from effective date of designations)	Fall 2016
Moderate area attainment date (end of 6 th calendar year after designations)	December 2021
Serious area attainment date (end of 10 th calendar year after designations)	December 2025

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Schedule of Major Designation Product Milestones

Milestone/Activity	Designations Target Date (December 2014)**
PM NAAQS promulgated (signature)	14-Dec-12
Designations Guidance Memorandum and Outreach Process for States and Tribes	16-Apr-13
Webinar with states and tribes to discuss guidance document and introduce/share PM Designations Database and PM Designations Mapping Tool	9-May-13
Public Webinar: "Using EPA's Designations Guidance, Data Sets, and the PM Designations Mapping Tool to Support Initial Area Designation Decisions: A Sample Application"	21-Aug-13
State & Tribal Recommendations to EPA	13-Dec-13
Draft TSD template to PM Designations work group/Regional Offices for Review	15-Jan-14
APM designation status meeting and discussion of decision principles	5-Feb-14
Preliminary 2011-2013 data review and DV calculation	TBD
Evaluate each area based on state recommendations and preliminary 5-factor analyses. Develop staff recommendations for each area. (May need to adjust following final 11-13 DVs)	31-May-14
Regions submit draft TSDs to OAQPS	27-Jun-14
OAQPS drafts and ROs review FR Notice of Availability (NOA) and template 120-day letters to Governors and tribal leaders	28-Jul-14

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Schedule of Major Designation Product Milestones

Milestone/Activity	Designations Target Date (December 2014)**
OAQPS finalizes FR NOA (120-day letter) and sends thru system	7-Aug-14
OAQPS finalizes communications plan, fact sheet, website, press release (for 120-day letters)	7-Aug-14
OAQPS sends 120-day letter (Governor and tribal leader) templates to ROs for RA signature	7-Aug-14
ROs complete and send to OAQPS preliminary TSDs for each area based on Administrator's decisions to accompany 120-day letters	8-Aug-14
EPA notifies States/Tribes of intended modifications to recommendations (RAs send 120-day letters)	14-Aug-14
Publish FR notice of state recommendations and EPA's intended modifications & initiate 30-day public comment period	29-Aug-14
Develop draft FR Notice, RTC outlines and draft comment summary	13-Nov-14
OAQPS completes FR notice, part 81 tables, State & Tribal designation decision letters, and initiates signature process	8-Dec-14
OAQPS finalizes communications plan, fact sheet, website, press release	10-Dec-14
Final Response To Comments documents completed and in docket	12-Dec-14
Final Technical Support Documents completed and in docket	12-Dec-14
Administrator signs final designations	12-Dec-14

** Dates in black type - target deliverable dates; dates in red type - actual completion dates

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Summary of State/Tribal Recommendations (as of February 4, 2014)

- Received recommendations from 48 states (still outstanding: NH, AL), 1 territory (PR), the District of Columbia, and 6 tribes
 - Submitted recommendations identify 15 different nonattainment areas in Iowa, Illinois, Ohio, Pennsylvania, and central and southern California.
 - Most of the submitting states based their recommendations on ambient air quality monitoring data for the 2010-2012 period, although some based their recommendations on preliminary 2013 data.

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Key APM Roles in the Designations Process

- APMs play active role in timely review of work products / deliverables
 - Area boundaries
 - Technical support documents
 - 120-day letters, federal register notices, briefing packages
- APMs help ensure that work products follow national consistency decision principles (e.g., policy and analytical approach)
 - Raise potential issues
 - Identify streamlining opportunities
- APMs ensure timely regional management briefings
- APMs guide discussions and collaboration with states/tribes and HQ
- Lead Region APM helps define the role of the lead region
 - National workgroup activities
 - Organization and coordination of meetings
 - Planning of workshops and webinars, as appropriate

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Decision Principles

- Designation categories
 - Nonattainment, Unclassifiable/Attainment, Unclassifiable
 - Initial area designations will be for the 2012 revised annual PM_{2.5} NAAQS and not for areas newly violating the retained PM standards (e.g., 24-hour NAAQS)
 - CAA does not require
 - EPA does not intend to pursue
 - Initial area designations will be “moderate,” with no bump ups to “serious”
 - Subpart 4 does not provide for voluntary bump ups
 - EPA’s past guidance in 59 FR 41999 presumes that a state’s moderate area attainment plan will provide the facts to justify the reclassification (an initial “serious” designation would need to be “fact” based)
 - Address implementation issues in the SIP, don’t presume future status in the designations process
- Monitoring data used in nonattainment determinations (expected December 2014)
 - EPA will use data from FEM/FRM/ARM monitors
 - Regions should work with OAQPS to make final decisions regarding monitoring data that are not comparable to the annual standard and/or invalid data ASAP (design values could change and affect designation status)
 - Do not intend to use non-regulatory monitors for initial nonattainment designations
 - Non-regulatory monitors could inform area boundaries
 - EPA does not intend to use near-road data as it will not be available prior to promulgating designations in 2014

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Decision Principles

- Monitoring data used in nonattainment determinations (continued)
 - Most state and tribal recommendations considered 2010-2012 data

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Decision Principles

- Technical Support Document (TSD) Development
 - Regions will develop TSDs for nonattainment and unclassifiable areas
 - TSDs for unclassifiable areas will be streamlined (not full TSD, but with sufficient justification for “unclassifiable” designation and boundary)
 - We will NOT develop TSDs for unclassifiable/attainment areas
 - If there are no violating monitors in a state nor parts of that state in another nonattainment area, we will NOT develop a TSD for that state
 - We will develop a single TSD for a multi-state or multi-region area
 - This might include a scenario in which a county in State X and Region Y contributes to a violating monitor in State A and Region B
 - The Region with the violating monitor /county will lead the development of the TSD for a multi-region area in which another county/state contributes to a violation, but does not itself have a violating monitor
 - As Regions develop their TSDs, they should follow the guidance in the TSD template using the indicated sources of information (e.g., PM Mapping Tool and data posted on the PM Designations Guidance and Data web page)
 - If state/tribal submitted data are more recent and can be used to wholly replace an identified chart, table or graph, use the state/tribal data and provide the appropriate reference
 - If state/tribal submitted data supplement, but do not wholly replace EPA data, use EPA data and note the supplemental information

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Decision Principles

- Nonattainment Area Naming Convention
 - If the nonattainment area has the same boundaries as a previous nonattainment area, use the previous name
 - If the nonattainment area has the same boundaries as the encompassing CSA/CBSA, use the name of the CSA/CBSA
 - If the nonattainment area is a single county or portion of a single county, the nonattainment area name will be e.g., "XXX County, CA"
- Nonattainment boundaries
 - April 2013 designations guidance indicates the CSA/CBSA as the analytical starting point
 - EPA did not identify a presumed boundary
 - EPA stated that we would analyze counties within the CSA/CBSA and adjacent counties, as needed
 - Full county designation is the default, but EPA recognizes partial county designation where it is supported by the 5-factor analysis. Examples:
 - Area with a single source and monitor located in the same county= full county NAA.
 - Area with multiple sources and a violating monitor in one county and nearby sources in adjacent counties= two (or more) full counties in the NAA
 - Area with a single source in one county and a violating monitor in an adjacent county = full county with the violating monitor + (potential) partial county with single source in the NAA (depends on size of county and distance from source to violating monitor)
 - For large counties in the west, where PM issue is due to urban or single sources, potential to designate partial county NAA.

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Decision Principles

- Unclassifiable/Attainment boundaries
 - EPA expects to designate each county or county equivalent in the FR notice / part 81 tables
 - Counties or county equivalents that constitute the "remainder of the state" will be determined by Federal Information Processing Standard (FIPS) codes maintained by the National Institute of Standards and Technology (NIST)
 - EPA does not expect to designate unclassifiable/attainment boundaries on a smaller (e.g., township) basis
- Exceptional event deadlines
 - The August 1, 2014 demonstration submittal date applies to those demonstrations which the air agency wants EPA to consider for designation decisions for the 2012 annual $PM_{2.5}$ NAAQS
 - The general schedule (3 yr) applies for demos for the 24-hr $PM_{2.5}$ NAAQS, other pollutants, and non-designation regulated annual $PM_{2.5}$ regulatory decisions

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Process Questions

- **Do the regional offices need to send letters to states/tribes acknowledging receipt of their recommendations?**
 - No. Historically, the sending of acknowledgment letters has been left to regional preference – some regions send letters while others do not. The CAA process does not require acknowledgment letters and OAQPS does not need them.
- **Does OAQPS or the Docket Office need the original, signed copy of the state/tribe recommendation letter?**
 - No, neither OAQPS nor the Docket Office need the original signed recommendation. Originals should be maintained by the Regional Offices according to your records management program.
- **When will state and tribal recommendations be posted to the website?**
 - OAQPS plans to post the recommendations to the website in Spring 2014 in the same general timeframe that the data sets are updated on the PM Designations website
 - Timeframe somewhat uncertain due to website migration, but posting will take place prior to issuing 120-day letters.
- **Will the regional offices need to include draft TSDs with their 120-day letters?**
 - No, the 120-day letters will refer states and tribes to the PM Designations website where the TSDs will be located.

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Next Steps

- Jan 13, 2014 – Draft TSD Template to Work Group for review and comment (by January 27, 2014)
- By Feb 6, 2014 – Revised draft TSD Template to Work Group
- Feb 24, 2014 – Webinar for Work Group to focus on using the TSD Template, PM Designations Mapping Tool, and supporting data/tools on the PM Designations website to review S/L/T recommendations and develop nonattainment recommendations and supporting TSDs
- Begin area analyses and development of TSDs
- Spring 2014 – Preliminary 2011-2013 data review and DV calculation
- Jun 20, 2014 – ROs provide OAQPS with preliminary nonattainment recs confirmed through Air Directors
- Jun 27, 2014 – ROs submit draft TSDs to OAQPS
- July 2014 – Elevation issues and briefings
- Aug 14, 2014 – RAs send 120-day letters

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PM Area Designations: Recommendations for 120-Day Letters

Pre-brief for Steve Page
July 17, 2014

Purpose: To Discuss Areas and Issues

- 2012 PM_{2.5} NAAQS Implementation Timeline
- Briefing and Decision Schedule for 120-Day Letters
- Decision Principles
- Data Issues and Options
- Overview of Areas
- Discussion of Individual Areas
 - Unclassifiable Areas
 - Focus Areas

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2012 PM_{2.5} NAAQS Implementation Timeline

Milestone	Date
EPA promulgates 2012 PM _{2.5} NAAQS rule	December 14, 2012
Issue Designations Guidance	April 16, 2013
States and tribes submit recommendations for PM _{2.5} designations to the EPA	No later than December 13, 2013
EPA notifies states/tribes re: any intended modifications to their recommendations (120-day letters)	No later than August 14, 2014 (120 days prior to final PM _{2.5} area designations)
EPA publishes public notice of state recs and EPA's intended modifications, if any; EPA initiates 30-day public comment period	No later than August 29, 2014
End of 30-day public comment period	No later than September 29, 2014
States/tribes submit additional information to respond to EPA's modification of a recommended designation	No later than October 29, 2014
EPA promulgates final PM _{2.5} area designations	December 2014 (effective early 2015)
Moderate area SIPs due (18 months from effective date of designations)	Fall 2016
Moderate area attainment date (end of 6 th calendar year after designations)	December 2021
Serious area attainment date (end of 10 th calendar year after designations)	December 2025

Briefing and Decision Schedule for 120-Day Letters

Milestone/Activity	Date
Regions provide preliminary area recommendations	June 20, 2014
HQ calls with Regions on preliminary recommendations	ongoing
Page pre-brief: Decisions for 120-day letters ★	July 17, 2014
OAR briefing: Decisions for 120-day letters with ADDs	July 18, 2014
AA-RA elevation meetings, and Decision briefing for Administrator, if necessary	July 21-30, 2014
Administrator decisions for 120-day letters completed	Aug 4, 2014
All TSDs for nonattainment areas completed	Aug 11, 2014
RAs send 120-day letters to states and tribes	Aug 14, 2014

Decision Principles

- Designation categories
 - Nonattainment, Unclassifiable/Attainment, Unclassifiable
 - Initial area designations will be for the 2012 revised annual PM_{2.5} NAAQS and not for areas newly violating the retained PM standards (e.g., 24-hour NAAQS)
 - Initial classifications will be “Moderate.” We are not recommending bump ups to “Serious” at this time.
- Nonattainment boundaries
 - April 2013 designations guidance indicates that we would analyze counties within the CSA/CBSA and adjacent counties, as needed
 - EPA did not identify a presumed boundary
 - EPA stated Full county designation is the default, but EPA recognizes partial county designation where it is supported by the 5-factor analysis.

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Decision Principles

- Monitoring data used in nonattainment determinations
 - EPA will use data from FEM/FRM/ARM monitors
 - Non-regulatory monitors will not be used to identify NAAQS violations, but could inform area boundaries
 - Data from the near-road network monitors that will begin collecting PM data in January 2015 will not be available prior to promulgating designations
 - Most state and tribal recommendations are based on 2010-2012 data; some are based on preliminary or early-certified 2013 data.
 - EPA expects to use 2011-2013 data for final designation decision

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- Numerous data issues
 - Extensive issues in IL, TN, GA

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Summary of PM_{2.5} Annual Design Value (DV) Data

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Data Issues and Options

- Widespread data quality/completeness concerns

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Data Issues and Options

- Options for areas with widespread data/quality completeness problems

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Data Issues and Options

- Options for areas with widespread data/quality completeness problems

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Overview of Areas

- Summary of state and tribal recommendations
 - Received recommendations from 50 states, 2 territories (VI, PR), the District of Columbia, and 6 tribes
 - Recommendations identify 15 different nonattainment areas in Iowa, Illinois, Ohio, Pennsylvania, and central and southern California
- Summary of OAQPS recommendations

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Overview of Areas

Region	Rec State	Recommended Designation	Area Name for the 2012 Annual PM2.5 Standard of 12 ug/m3	Comparison to State Recommendation	Focus Area
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Focus Areas

Region	Rec State	Recommended Designation	Area Name for the 2012 Annual PM2.5 Standard of 12 ug/m3	Comparison to State Recommendation
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CAA Designation Criteria and EPA Guidance

CAA Criteria

- Area is to be designated nonattainment if it does not meet the standard or if it contributes to poor air quality in a nearby area that does not meet the standard.

EPA Guidance

- Guidance presented 5-factor analysis:
 1. Air quality data
 2. Emissions and emissions-related data
 - location of sources and population
 - emissions levels and emissions controls
 - VMT and commuting data
 - growth patterns
 3. Meteorology
 4. Geography/topography (e.g., air basins, mountain tops)
 5. Jurisdictional boundaries

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Johnstown, PA

- Background:
 - Existing nonattainment area for both the 1997 and 2006 PM NAAQS includes Cambria and Indiana (partial) Counties
- State Recommendation:
 - PA: Cambria County (only county with violating monitor)
- OAQPS

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Northampton, PA

- Background:
 - Northampton and Lehigh Counties currently NA for the 2006 PM NAAQS (Allentown, PA)
- State Recommendation:
 - PA: Northampton County (only county with violating monitor)
- OAQPS:

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Canton-Massillon, OH

- Background:
 - Canton-Massillon: Historically consists of single, whole Stark County in Maintenance area for the 1997 and 2006 PM NAAQS
 - Wayne County is adjacent to Canton area but has not previously been included in the nonattainment area.
- OH State Recommendation:
 - Canton: Same as existing (Stark County)
- OAQPS:

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Cleveland-Akron-Lorain, OH

- Background:
 - Cleveland-Akron-Lorain: Historically consists of 6 whole and 1 partial counties in Maintenance area for the 1997 and 2006 PM NAAQS.
- OH State Recommendation:
 - Cleveland: Single county with violating monitor (Cuyahoga County)
- OAQPS:

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Cincinnati/Northern Kentucky , OH-KY

- Background:
 - Maintenance area for the 1997 PM NAAQS (4 whole OH counties; 3 partial KY counties)
- State Recommendations:
 - OH: 3 of 4 historic counties (counties with violating monitors)
 - KY: Attainment for Boone, Campbell & Kenton Counties. No violating monitors.
- OAQPS:

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Imperial County, CA

- Background:
 - Existing nonattainment area for the 2006 PM NAAQS (partial Imperial County)
 - Existing PM10 nonattainment area (partial Imperial County, but includes all of Imperial Valley. PM10 boundary is larger than 2006 boundary)
- State Recommendations:
 - CA: Same as 2006; CARB did not provide any technical justification for their boundary recommendation.
- OAQPS:

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Louisville, KY-IN

- Background:
 - Currently NA for the 1997 annual PM NAAQS (2 KY counties; 2 whole and 1 partial IN counties)
 - Historically monitors in both IN and KY have violated
 - 1997 status – final CDD for IN; CDD for KY
 - Data issues in Jefferson, KY have stalled the redesignation to attainment process for the 1997 NAAQS
 - For 2012 PM NAAQS, KY data (Jefferson County) are invalid, but monitor in Clark, IN violate
 - Assessing KY counties for contribution to the violating monitor in IN
- State Recommendations:
 - IN: Attainment based on preliminary 2013 data and projected 2014 data
 - KY: Unclassifiable for Jefferson County, unclassifiable/attainment for rest of state
- OAQPS:

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Attachments

- Table 1. Likely Nonattainment Areas
- Table 2. Likely Unclassifiable Areas
- Table 3. Likely Unclassifiable/Attainment with Exceptional Event Concurrence
- Maps of Focus Areas

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PM Area Designations: Recommendations for 120-Day Letters

Briefing for Janet McCabe
July 18, 2014

Purpose: To Discuss Areas and Issues

- 2012 PM_{2.5} NAAQS Implementation Timeline
- Briefing and Decision Schedule for 120-Day Letters
- Decision Principles
- Monitoring Data Principles
- Summary of PM_{2.5} Annual Design Value Data
- Data Quality/Completeness Issues and Options
- Overview of Areas
- Focus Areas
 - Clean Air Act Designation Criteria and EPA Guidance
 - Individual Area Summaries
- Attachments

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Briefing and Decision Schedule for 120-Day Letters

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All TSDs for nonattainment areas completed	Aug 11, 2014
RAs send 120-day letters to states and tribes	Aug 14, 2014

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Decision Principles

- Designation categories
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 - Initial area designations will be for the 2012 revised annual PM_{2.5} NAAQS and not for areas newly violating the retained PM standards (e.g., 24-hour NAAQS)

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- Nonattainment boundaries
 - April 2013 designations guidance indicates that we would analyze counties within the CSA/CBSA and adjacent counties, as needed
 - EPA did not identify a presumed boundary
 - EPA stated Full county designation is the default, but EPA recognizes partial county designation where it is supported by the 5-factor analysis.

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Monitoring Data Principles

- EPA will use data from FEM/FRM/ARM monitors to determine attainment status
 - We will not use non-regulatory monitors to identify NAAQS violations
 - Non-regulatory monitors could inform area boundaries
 - Near-road network monitors will begin collecting PM data in January 2015, so not available
- Most state and tribal recommendations are based on 2010-2012 data; some are based on preliminary or early-certified 2013 data.
- EPA expects to use 2011-2013 data for final designation decisions.

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- Numerous data-related issues (to be covered in later slides)

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Summary of PM_{2.5} Annual Design Value (DV) Data

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Data Quality/Completeness Issues

- Data quality is the foundation of defensible designations. We developed and followed a data decision hierarchy to help determine appropriate area designation status – many areas “unclassifiable”

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Options for Data Issue Areas: Illinois

- Affects areas like Chicago and East St. Louis

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Options for Data Issue Areas: Illinois

Options continued...

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Options for Data Issue Areas: Georgia

- Affects 8 areas

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Overview of Areas

- Summary of state and tribal recommendations
 - Received recommendations from 50 states, 2 territories (VI, PR), the District of Columbia, and 6 tribes
 - Recommendations identify 15 different nonattainment areas in Iowa, Illinois, Ohio, Pennsylvania, and central and southern California
- Summary of OAQPS recommendations

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Overview of Areas

Region	Rec State	Recommended Designation	Area Name for the 2012 Annual PM2.5 Standard of 12 ug/m3	Comparison to State Recommendation	Focus Area
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Focus Areas

Region	Rec State	Recommended Designation	Area Name for the 2012 Annual PM2.5 Standard of 12 ug/m3	Comparison to State Recommendation
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CAA Designation Criteria and EPA Guidance

- CAA Criteria
 - Area is to be designated nonattainment if it does not meet the standard or if it contributes to poor air quality in a nearby area that does not meet the standard.
- EPA Guidance
 - Guidance presented 5-factor analysis:
 1. Air quality data
 2. Emissions and emissions-related data
 - location of sources and population
 - emissions levels and emissions controls
 - VMT and commuting data
 - growth patterns
 3. Meteorology
 4. Geography/topography (e.g., air basins, mountain tops)
 5. Jurisdictional boundaries

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Johnstown, PA

- Background:
 - Existing nonattainment area for both the 1997 and 2006 PM NAAQS includes Cambria and Indiana (partial) Counties
- State Recommendation:
 - PA: Cambria County (only county with violating monitor)
- Possible EPA Recommendation:

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Northampton, PA

- Background:
 - Northampton and Lehigh Counties currently NA for the 2006 PM NAAQS (Allentown, PA)
- State Recommendation:
 - PA: Northampton County (only county with violating monitor)
- Possible EPA Recommendation:

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Liberty-Clairton, PA

- Background:
 - Liberty-Clairton is located in Allegheny County, PA and has historically been its own NAA surrounded by the larger Pittsburgh NAA
 - The Pittsburgh NAA has historically consisted of the remainder of Allegheny County and 4 additional whole counties and 3 additional partial counties
 - As of 6/25/14, the Pittsburgh NAA is NA for the 1997 PM NAAQS and has a clean data determination (CDD) for the 2006 NAAQS. The Liberty-Clairton Area has a CDD for 1997 and is NA for the 2006 NAAQS.
 - Considering 2010-2012 data, both the Liberty-Clairton monitor and 2 monitors in the historical Pittsburgh NAA violated the 12 ug/m3 standard. With 2013, the Pittsburgh monitors attain and only the Liberty-Clairton monitor violates.
- PA Recommendation (based on 2010-2012 data):
 - Liberty-Clairton: NA, with historical Allegheny (p) boundaries
 - Pittsburgh: only the 2 counties with violating monitors – Allegheny (remainder of county) and Westmoreland
- Possible EPA Recommendation:

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Louisville, KY-IN

- Background:
 - Currently NA for the 1997 annual PM NAAQS (2 KY counties; 2 whole and 1 partial IN counties)
 - Historically monitors in both IN and KY have violated
 - 1997 status – IN portion has final, and KY portion has proposed CDD
 - Data issues in Jefferson, KY have stalled the attainment redesignation process for the 1997 NAAQS
 - For 2012 PM NAAQS, KY data (Jefferson County) are invalid, but monitor in Clark, IN violates
 - We are assessing KY counties for contribution to the violating monitor in IN
- State Recommendations:
 - IN: Attainment based on preliminary 2013 data and projected 2014 data
 - KY: Unclassifiable for Jefferson County, unclassifiable/attainment for rest of state
- Possible EPA Recommendation:

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Canton-Massillon, OH

- Background:
 - Canton-Massillon: Historically consists of single, whole Stark County area for the 1997 and 2006 PM NAAQS (now Maintenance)
 - Wayne County is adjacent to Canton area but has not previously been included in the nonattainment area.
 - Summit County is adjacent to Stark, but has historically been part of the Cleveland nonattainment area.
- OH State Recommendation:
 - Canton: Same as existing (Stark County)
- Possible EPA Recommendation:

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Cleveland-Akron-Lorain, OH

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 - Cleveland-Akron-Lorain: Historically consists of 6 whole and 1 partial counties for the 1997 and 2006 PM NAAQS (now Maintenance).
- OH State Recommendation:
 - Cleveland: Single county with violating monitor (Cuyahoga County)
- Possible EPA Recommendation:

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Cincinnati/Northern Kentucky, OH-KY

- Background:
 - Maintenance area for the 1997 PM NAAQS (4 whole OH counties; 3 partial KY counties)
- State Recommendations:
 - OH: 3 of 4 historic counties (Butler, Clermont and Hamilton)
 - KY: Attainment for Boone, Campbell & Kenton Counties. No violating monitors.
- Possible EPA Recommendation:

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Imperial County, CA

- Background:
 - Existing nonattainment area for the 2006 PM_{2.5} NAAQS (partial Imperial County)
 - Also existing PM₁₀ nonattainment area (partial Imperial County, but includes all of Imperial Valley). PM₁₀ boundary is larger than PM_{2.5} boundary.
- State Recommendations:
 - CA: Same as 2006; CARB did not provide any technical justification for their boundary recommendation.
- Possible EPA Recommendation:

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Attachments

- Table 1. Likely Nonattainment Areas
- Table 2. Likely Unclassifiable Areas
- Table 3. Likely Unclassifiable/Attainment with Exceptional Event Concurrence
- Maps of Focus Areas

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PM Area Designations:
Recommendations for 120-Day Letters
Part IV

Briefing for Janet McCabe
August 6, 2014

Overview of Nonattainment Areas

(Revised 8/1/14)

Region	State	Area Name	Comparison to State Recommendation	Note Relative to State Recommendation
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Overview of Unclassifiable and Deferral Areas

(Revised 8/1/14)

Region	State(s)	EPA Recommended Designation	Area Name	Comparison to State Recommendation	Issue
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Summary of Deferred Area Recommendations

Area	Deferral Counties (no final action)	Adjacent CBSA Counties "U/A"
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Summary of Unclassifiable Area Recommendations

Area	Unclassifiable Counties	Adjacent CBSA Counties "U/A"
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Summary of Unclassifiable Area Recommendations

Area	Unclassifiable Counties	Adjacent CBSA Counties "U/A"
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Summary of Unclassifiable Area Recommendations

Area	Unclassifiable Counties	Adjacent CBSA Counties "U/A"
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- Insert specific area slides with justifications with focus on historic data trend and manager-level contribution analysis conclusions

Chicago IL-IN

- Background:
 - Historic 1997 NAAQS NAA includes 8 IL counties and 2 IN counties
 - IL portion of the CBSA will be “unclassifiable” and has historically had the highest annual DVs (tied with Lake County in 2011 (12.4 ug/m³)
 - IN has 2 additional CBSA counties, and WI has 1 county
 - No IN monitor has had annual DV >12 ug/m³ since 2012 (2010-2012 data)
- IN and WI Recommendations: Unclassifiable/Attainment
- Possible EPA Recommendation for IN and WI counties:

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St. Louis MO-IL

- Background:
 - Historic 1997 NAAQS NAA includes 4 IL counties and 5 MO counties
 - IL portion of the CBSA will be “unclassifiable” but has historically had highest annual DVs since 2003
 - No MO monitor has annual DV >12 ug/m³ since 2011 (violation in 2010 and 2011 – site changed to ineligible for 2012 DV)
- MO Recommendation: Unclassifiable/Attainment
- Possible EPA Recommendation for MO counties:

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Davenport IA-IL CBSA

- Background:
 - No prior nonattainment designation for PM2.5 and no annual DV > 12 ug/m³ since 2012
 - Only portion of CBSA in IA is Scott County, which has historically had the highest annual DVs in the CBSA (in larger CSA, Clinton and Muscatine also among historical highest DVs)
 - Population center split between IA and IL, with more point sources on the IA side
 - IL portion of the CBSA will be “unclassifiable”
- IA Recommendation: Unclassifiable/Attainment
- Possible EPA Recommendation for Scott County, IA:

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Fort Smith AR-OK CBSA

- Background:
 - No prior nonattainment designation for PM2.5 and no annual DV > 12 ug/m³ since 2003
 - Crawford and Sebastian Co contain the urbanized areas
- AR and OK Recommendation: Unclassifiable/Attainment
- Possible EPA Recommendation for all counties in the area:

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Next Steps

Milestone/Activity	Date
OAR briefing: Decisions for 120-day letters with ADDs	July 18-24, 2014
AA-RA elevation meetings and Decision briefing for Administrator, if necessary	July 24-30, 2014
Final Administrator input	★ by Aug 4, 2014
All TSDs for nonattainment areas completed	Aug 11, 2014
RAs send 120-day letters to states and tribes	Aug 14, 2014
End of 30-day public comment period	September 29, 2014
States/tribes submit additional information to respond to EPA's modification of a recommended designation	by October 29, 2014
EPA promulgates final PM _{2.5} area designations (except deferral areas)	December 12, 2014 (effective early 2015)

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